REMARKS

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Claims 2, 7-11, and 26-32 are pending herein.

1. Claims 2, 7-11, and 25-31 were rejected under 35 USC 103(a) as being unpatentable over Iijima et al. (2001/0006042) in view of Vaidya et al. (US 5076203). This rejection is respectfully traversed for the following reasons.

The claimed invention is drawn to an apparatus for cooling and positioning a translating substrate during a continuous high-throughput deposition process. The claimed invention particularly calls for a substrate block having gaseous coolant delivery channels open to the deposition chamber through orifices at multiple points where the substrate block contacts the translating substrate.

While the PTO has relied upon Iijima et al. to allegedly teach the main features of the claimed invention, Iijima et al. do not disclose gaseous coolant delivery channels open to the deposition chamber. The PTO has apparently relied upon Vaidya et al. to allegedly overcome this deficiency.

Vaidya et al. fail to disclose, suggest, or remotely enable a substrate block having gaseous coolant delivery channels open to the deposition chamber through orifices at multiple points where the substrate block contacts the translating substrate. Rather, Vaidya et al. disclose a substrate block having a porous layer between gaseous coolant delivery channels and the translating substrate (Figs 7-10, and Col 6 lines 5-42). Vaidya et al. do not disclose or even remotely suggest incorporation of gas channels open to the deposition chamber.

Additionally, claim 26 recites even further patentable subject matter over claim 2, notably reciting that the internal gaseous coolant delivery channels extend open and unfilled to the array of orifices. Not only do Vaidya et al. fail to disclose or even remotely suggest gaseous coolant delivery channels as noted above, but clearly fail to disclose open, unfilled channels as depicted in FIG. 3B of the present application, for example.

For at least the forgoing reasons in view of the amendments to the present claims, Applicants respectfully submit that the presently claimed invention would not have been

anticipated by Iijima et al. in view of Vaidya et al. Accordingly, withdrawal of the Section 103 rejection over Iijima et al. in view of Vaidya et al. is respectfully requested.

Applicant(s) respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims.

Should the Examiner deem that any further action by the Applicants would be desirable for placing this application in even better condition for issue, the Examiner is requested to telephone Applicants' undersigned representative at the number listed below.

The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account Number <u>50-3797</u>.

Respectfully submitted,

Date

3/5/07

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